

CONTINUATION OF APPLICATION FOR A SEARCH WARRANT

I, Scott Bauer, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

INTRODUCTION, AGENT BACKGROUND, AND PURPOSE OF THE WARRANT

1. I, Scott Bauer, am currently employed as a Special Agent with Homeland Security Investigations (HSI) and have been so employed since March of 2012. I am currently assigned to HSI Grand Rapids, MI. As an HSI Special Agent, I have investigated (among other crimes) criminal violations of U.S. Customs laws, and federal child sexual exploitation violations, to include those involving the use of the Internet and interstate communications. I have received training in the investigation of child sexual exploitation and I have conducted numerous investigations relating to sexual crimes against children through the use of the Internet. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. Prior to employment with HSI, your affiant was a Special Agent with the United States Department of the Interior (DOI) Office of the Inspector General (OIG) for approximately four years, focusing on the investigation of fraud, public corruption, and cyber-crimes, to include investigations relating to child sexual exploitation. Prior to employment with the DOI OIG, your affiant was a Police Officer with the City of Casselberry, Florida for approximately two years and eight months.

3. The facts of this case, as more fully detailed below, reveal that Jonathan Ryan Ledoux previously communicated with someone about traveling to England to engage in sexual acts with a minor.

4. This affidavit contains information necessary to support a finding of probable cause to search the Motherless.com account of Ledoux for evidence, contraband, fruits, and instrumentalities of crimes (described more fully in Attachment B) in violation of 18 U.S.C. § 2422(b) and 2423(b). 18 U.S.C. § 2422(b) makes it a crime to attempt to coerce and entice a minor to engage in sexual activity for which any party can be charged. 18 U.S.C. § 2423(b) makes it a crime to travel in foreign commerce for the purpose of engaging in illicit sexual conduct.

FACTUAL BACKGROUND OF INVESTIGATION

5. On November 16, 2018, HSI Grand Rapids Special Agent (SA) Bauer, acting in an undercover capacity (UC), entered the incest chatroom via the Motherless website (SA Bauer maintained an undercover account on Motherless that described the user as a single female and suggested the user had children).

6. UC received a private message from the target, who identified himself as a 30-year-old male, living in Massachusetts. UC informed the subject that UC was a mother of two kids, a 14-year-old girl and a 9-year-old girl. The target stated, among other things, he was interested in “young” and “incest.” Referring to the minor girls, the target asked, “If you found a man you liked being with though, would you be against him being active with them if he wanted?” The target later wrote, in part, “I definitely would like to find a woman like you, with some young girls to play with (winking emoticon).”

7. On November 16, 2018 the following exchange occurred between UC and the target (DeviantNerd42) via the Motherless chatroom (typographical errors in the chats are from the original):

DeviantNerd42: I had someone I was planning this with but it's fallen apart

DeviantNerd42: Lots of promises, lots of next chance I gets lots of this and that but nothing ever comes to fruition

UC: I know what I have and your not the only one I'm talkin to

UC: oh really? meet them on ML?

DeviantNerd42: Yeah they're in my profile still set as I Own X

DeviantNerd42: though It hink I'm gonna take that off now tbh lol

UC: and you dont have to answer this but was she like me with kids or just an adult hookup?

DeviantNerd42: With a daughter and son, I had talked to her 'daughter' but I don't honestly know. I got pictures, but isn't it odd that she can only get one chat messenger working and her daughter can only get a different one?

DeviantNerd42: and they both never message me, they only reply to me and always right after another.

UC: yeah

DeviantNerd42: Had excuses left and right as to why thing's haven't progressed and I've been patient but it's just not going anywhere

DeviantNerd42: and it feels more and more fake

UC: well I dont know her situation so I cant really comment

DeviantNerd42: It's just inconvinient, and she's in england so this isn't a quick 200 dollar flight like it would be for you lol

DeviantNerd42: I need some commitment to feel safe.

8. On November 19, 2018, the target stated, "You know how many people I meet on ml that suggest I should beat and brutally rape their girls into submission?" The target later stated that he does not believe most people he talks to on Motherless.

9. On December 28, 2018 the target stated, "My needs require activities with young girls lol. I know others on ml that I talk to about the lifestyle but so far you've been the most same and safest of the bunch" The target later corrected, "Sane.*"

10. On January 12, 2019, while talking about SA Bauer's undercover Motherless account being deleted by Motherless, Ledoux stated "Like I said chat is logged a mod probably went over old logs saw something and banned you. Nothing to worry about just make a new account." When SA Bauer asked if the account would be reported to law enforcement, the target replied, "No. Otherwise I'd be in jail lol."

11. On March 22, 2019, Ledoux traveled to Grand Rapids, MI and was subsequently charged with violations of 18 U.S.C. § 2423(b) and 18 U.S.C. § 2422(b). In a post-*Miranda* interview, Ledoux told SA Bauer he had communicated with dozens of individuals on Motherless regarding sex with underaged girls, but added the conversations were not very detailed and at no time was child pornography shared.

12. Additionally, Ledoux told SA Bauer in either September or October of 2018, he booked a trip to England to visit a woman he met on Motherless with a daughter he believed was approximately 15 years old. Ledoux stated he originally planned to pursue a sexual relationship with the mother but after learning about her daughter had intentions of engaging in sexual intercourse with her. LEDOUX stated he did not travel

to England due to a medical issue with his father, causing him to cancel. Ledoux stated he then lost contact with the woman.

13. On March 27, 2019, HSI Grand Rapids sent a preservation letter to Motherless requesting Ledoux's account content be preserved in anticipation of a court order.

BACKGROUND ON MOTHERLESS.COM

14. Motherless.com (frequently referred to as "ML" by users) is free website that allows users to create profiles and post pornographic videos and pictures based a variety of sexual interests. Motherless.com members may also conduct a search for videos and pictures posted on the website using a keyword search. The main page of Motherless.com reads, "Motherless is a moral free file host where anything legal is hosted forever! All content posted to this site is 100% user contributed. All illegal uploads will be reported. If you want to blame someone for the content on this site, blame the freaks of the world – not us. Feel free to join the community and upload your goodies. While you're here check out the boards, chat, groups, galleries, videos and images." Motherless.com members may also create and join a variety groups on the website based on their sexual interests, including over 100 groups dedicated to "incest", "jailbait", and "teen." Motherless.com members may post advertisements in the website's "classified" section seeking to meet other members with the same sexual interests such as incest and rape. In addition, Motherless.com members may use the website's chat room service and instantly communicate with other members.

CONCLUSION

Based on the foregoing, I submit that there is probable cause to believe that evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2422(b) and 18 U.S.C. § 2423(b) (described more fully in Attachment B) will be found in the Motherless.com account of Ledoux (described more fully in Attachment A).